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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	CASE NO. 3:15-CR-0502 WHA
)	
Plaintiff,)	
)	STIPULATION AND PROPOSED ORDER
v.)	EXCLUDING TIME UNDER THE
)	SPEEDY TRIAL ACT FROM DECEMBER 1,
RICHARD LAURENCE STEWART,)	2015 TO JANUARY 12, 2016
)	
Defendant.)	
)	
)	

On December 1, 2015, defendant Richard Laurence Stewart appeared before this Court. At the hearing, the Court directed the parties to appear on January 12, 2016, for a further status conference. The parties agree that the defendant's counsel requires additional time to review discovery provided by the government, and the parties agree that the additional time is necessary for effective preparation. Therefore, the parties agree and jointly request that the time between December 1, 2015 and January 12, 2016 should be excluded in order to ensure reasonable time necessary for the effective preparation of counsel pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv). The parties agree that the ends of justice served by granting the continuance outweigh the best interest of the public and the defendant in a speedy trial.

STIPULATION AND ~~PROPOSED~~ ORDER
CASE NO. 3:15-CR-502 WHA

1 DATED: December 3, 2015

Respectfully Submitted,

2 BRIAN J. STRETCH
Acting United States Attorney

3
4 /s/ Shailika Kotiya
SHAILIKA S. KOTIYA
Assistant United States Attorney

6 OFFICE OF THE FEDERAL
7 PUBLIC DEFENDER


8 /s/ Elizabeth Falk
9 ELIZABETH FALK
Attorney for Defendant Richard Laurence Stewart

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11
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13 **[PROPOSED] ORDER**

14 For the reasons stated above, the Court finds that the exclusion of time from December 1, 2015,
15 through and including January 12, 2016, is warranted and that the ends of justice served by the
16 continuance outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C.
17 § 3161(h)(7)(A). The failure to grant the requested continuance would deny the defendant effective
18 preparation of counsel, and would result in a miscarriage of justice. 18 U.S.C. § 3161(h)(7)(B)(iv).

19 IT IS SO ORDERED.

20
21 DATED: December 7, 2015.


22 HON. WILLIAM ALSUP
United States District Court Judge